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6 BACKGROUNDCHECKS.COM, LLC
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 HUGO BARRAGAN,
12 Plaintiff,
13 vs.
14 EARLY WARNING SERVICES, LLC;
THE RETAIL EQUATION; and
15 BACKGROUNDCHECKS.COM,
16 Defendants.
17

Case No. 2:20-cv-00795-KJD-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM, LLC TO
FILE RESPONSIVE PLEADING
[SECOND REQUEST]**

18 Plaintiff HUGO BARRAGAN (“Plaintiff”) and Defendant BACKGROUNDCHECKS.COM,
19 LLC (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend
20 the time for Defendant to file a responsive pleading to Plaintiff’s Complaint for thirty (30) days from
21 the from the current deadline of June 25, 2020, up to and including **July 27, 2020**.
22

23 Pursuant to the inherent delays caused by the current COVID-19 pandemic, Defense counsel
24 has been unable to conduct a complete investigation. The requested extension is necessary for
25 additional time to investigate the allegations in the Complaint and prepare a response to the Complaint.
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28

This is the second request for an extension of time to respond to the Complaint. This request is made in good faith and not for the purpose of delay.

Dated: June 22, 2020

Dated: June 22, 2020

/s/ Matthew I. Knepper

**DAVID KRIEGER, ESQ.
KRIEGER LAW GROUP, LLC**

MATTHEW I. KNEPPER, ESQ.
MILES N. CLARK, ESQ.
KNEPPER & CLARK LLC

Attorneys for Plaintiff
HUGO BARRAGAN

/s/ Diana G. Dickinson

**DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.**

Attorney for Defendant
BACKGROUNDCHECKS.COM, LLC

IT IS SO ORDERED.

Dated: June 22, 2020.

Carl Gaddis

UNITED STATES MAGISTRATE JUDGE

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